

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

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| In re Application of: |) | |
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| Robert H. Halstead, Jr. et al. |) | Confirmation No. 1846 |
| |) | |
| Application No.: 09/760,031 |) | Group Art Unit: 2193 |
| |) | |
| Filed: January 12, 2001 |) | Examiner: Insun Kang |
| |) | |
| For: SYSTEM AND METHOD |) | |
| SUPPORTING PROPERTY |) | |
| VALUES AS OPTIONS |) | |

Mail Stop Issue Fee

Commissioner for Patents
P.O. Box 1450
Alexandria, VA 22313-1450

Sir:

COMMENTS ON STATEMENT OF REASONS FOR ALLOWANCE

Applicant received a Notice of Allowability and Notice of Allowance and Fee(s)
Due dated April 22, 2008. The issue fee is being filed herewith.

In the Notice of Allowability, in paragraph 3, the Examiner provided a statement of reasons for allowance. Applicant does not necessarily agree with the Examiner's asserted reasons why the claims patentably distinguish from the prior art. For example, Applicant does not necessarily agree with the Examiner's apparent assertion that the listed features are the only reason the claims are allowable over the prior art. Instead, Applicant submits that claims 1-24 are patentably distinguishable from the prior art at least because the prior art, either alone or in combination, fails to teach or suggest the recitations therein.

The Examiner's Statement of Reasons for Allowance might be construed to contain characterizations of the claims and the prior art with which Applicant does not necessarily agree. Unless expressly noted otherwise, Applicant declines to subscribe to any statement or characterization in the Examiner's Statement of Reasons for Allowance.

Please grant any extensions of time required to enter these Comments and charge any additional required fees to our Deposit Account No. 06-0916.

Respectfully submitted,

FINNEGAN, HENDERSON, FARABOW,
GARRETT & DUNNER, L.L.P.

Dated:

June 11, 2008

By:

Maura K. Moran

Maura K. Moran
Reg. No. 31,859